

**THE BUZBEE LAW FIRM**  
*www.txattorneys.com*

December 10, 2024

**VIA ECF**

**Email and U.S. Mail**

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Honorable Analisa Torres  
United States District Court for the  
Southern District of New York  
500 Pearl Street  
New York, NY 10007-1312

*Re: Recent “Letter Briefs” filed in Jane Doe v. Shawn Carter et al., 24-cv-07975-AT*

Dear Judge Torres:

I write on behalf of my client Jane Doe, as well as on the behalf of myself and my firm, in response to several recent improper communications directed to the Court by counsel for defendant Shawn Carter in the above-captioned action.

On December 8, 2024, my client filed an amended complaint naming Mr. Carter as an additional defendant in this matter. In conjunction with that filing, my firm filed a renewed motion for the plaintiff to proceed anonymously. Rather than merely oppose that motion, as would be expected and proper, defendant Carter filed (the very next day) his own “motion” to deny anonymity and/or to dismiss under Rule 12(b)(1).

It appears defendant Carter made that separate filing, which we believe to be procedurally improper and substantively deficient, to serve as the pretext for defense counsel to submit two “letter briefs” to the Court on December 9 and 10. These “letter briefs” are, frankly, nothing short of defamation hiding behind the thinnest veneer of litigation privilege.

Except for one sentence requesting an expedited hearing, the “letter briefs” have absolutely nothing to do with the only pending issue before the Court – namely, whether my client should be allowed to continue to proceed anonymously. The letters’ otherwise irrelevant contentions that the amended complaint’s allegations are “inflammatory” and “frivolous,” as against counsel’s plea that “Mr. Carter is entirely innocent,” are merely press releases dressed as legal filings.

Counsel's December 10, 2024 letter goes much further – and entirely too far – by accusing my firm and I of outright unethical behavior that never happened and which I would never countenance. To be clear, my firm and I categorically deny all of the baseless allegations levied by Mr. Carter and his counsel in these letters. We will respond in due course and due time, through memoranda of law and other appropriate means, to the legal issues at hand as well as the accusations raised by Mr. Carter and his counsel. We also will address verifiable improprieties committed by defense counsel, outright illegal conduct for which we have actual evidence rather than vague hearsay declarations. For the moment, we simply want to timely inform the Court that such responses will be forthcoming.

Respectfully,  
/s/ Anthony G. Buzbee  
Anthony G. Buzbee